

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Barbara Bady	:	
	:	
Debtor	:	Case No.: 16-18690AMC

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, by and through her undersigned counsel, hereby move to modify her Chapter 13 Plan and in support thereof aver as follows:

1. Debtor Confirmed her Chapter 13 Plan with this Honorable Court on July 17, 2017.
2. On or about December 13, 217 Sun West Mortgage Company amended its secured mortgage proof of claim.
3. To enable the Debtor to have a complete reorganization, the Debtor is desirous of modifying her Confirmed Plan to include this difference in pre-petition mortgage arrearage.
4. The Debtor by and through her Counsel has drafted a proposed modified plan to address this debt. Please see attached proposed modified plan marked as “**Exhibit A**” and incorporated herein.
5. This modified Chapter 13 Plan is feasible and will allow the Debtor to successfully complete her Chapter 13 Bankruptcy.

WHEREFORE, the Debtor requests that she be permitted to modify her Chapter 13 Plan for the above stated reasons.

Dated: November 19, 2018

/s/Brad J. Sadek, Esq
Brad J. Sadek, Esq.
Attorney for Debtor